



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**ZACHARY W. CARTER**  
*Corporation Counsel*

**ARIEL LICHTERMAN**  
*Assistant Corporation Counsel*  
phone: (212) 356-3520  
fax: (212) 356-3509  
email: alichter@law.nyc.gov

February 27, 2015

**BY ECF**

The Honorable Kiyo A. Matsumoto  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Anthony Daniels v. Marisol Bonilla and Sean Hughes,  
14-CV-3017 (KAM) (LB)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to represent defendants Marisol Bonilla and Sean Hughes in the above-referenced matter. Pursuant to Your Honor's Order dated December 22, 2014, Defendants filed their fully-briefed Motion to Dismiss Plaintiff's Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(6), and in accordance with Your Honor's Individual Rules and Practices, submit this cover letter to specify each document filed in the motion package. The motion package includes:

- Defendants' Notice of Motion to Dismiss Plaintiff's Amended Complaint Pursuant to Fed. R. Civ. P. 12(b)(6);
- The Declaration of Ariel Lichterman in support of Defendants' Motion, along with Exhibits A – E annexed thereto;
- A Memorandum of Law in Support of Defendants' Motion;
- Plaintiff's Opposition to Defendants' Motion;
- Defendants' Reply Memorandum in Support of their Motion.

Defendants are forwarding two courtesy copies of the aforementioned motion package to the Court in accordance with Your Honor's December 22, 2014 Order and Individual Rules and Practices. Defendants thank the Court for its time and consideration in this matter.

Respectfully submitted,

\_\_\_\_\_  
/s/

Ariel Lichterman  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: Anthony Daniels (By First Class Mail)  
*Plaintiff Pro Se*  
Sing Sing Correctional Facility  
354 Hunter Street  
Ossining, NY 10562-5442  
DIN #: 14A3224